

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HIGROUND CO., LTD.; and HIGROUND  
PTE LTD.,

*Plaintiffs,*

v.

HENRY HAN-WOONG LEE; GENESIS  
DIGITAL ASSETS PTE, LTD.; GENESIS  
GROUP PARTNERS, LLC; NEON  
PARTNERS, LLC; STONEFORT  
CONSULTANTS FZC; PETRO ECO  
BUILD SDN BHD; WEST RANCH  
CAPITAL MANAGEMENT; JULES  
CORPORATION; JONATHAN CHAN;  
NEON PARTNERS, LLC; GENESIS-  
NEON GROUP, LLC;

*Defendants.*

Civil Action No.: 1:23-cv-08618-JSR

**NOTICE OF MOTION TO DISMISS BY  
DEFENDANT HENRY HAN-WOONG LEE  
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

To: **KIM & BAE, P.C.**  
Attn: Bong June Kim, Esq.  
Attn: Demetrios Pavlou, Esq.  
2160 North Central Road, Suite 303  
Fort Lee, New Jersey 07024  
*Attorneys for Plaintiffs*

**PLEASE TAKE NOTICE THAT** defendant, Henry Han-Woong Lee (“Henry Lee”, “Lee” or “Defendant”), by and through his undersigned counsel, Kim, Lim & Partners, will move before this Court, the Honorable Jed S. Rakoff, U.S.D.J., 500 Pearl Street, Courtroom 14B, New York, New York 10007, on March 15, 2024 at 11:00 am or as soon thereafter as counsel may be heard, for an Order dismissing all counts asserted in the Complaint as against Defendant Lee. A contemporaneously filed supporting Memorandum of Law, Declarations, and exhibits annexed thereto accompany this motion.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Judge Rakoff's Order entered February 5, 2024, any opposing affidavits and answering memoranda of law shall be served by February 23, 2024, and any reply papers filed by March 8, 2024.

**PLEASE TAKE FURTHER NOTICE** that the movant, Defendant Henry Han-Woong Lee, respectfully requests oral argument if an opposition is filed hereto.

Dated: February 9, 2024

Respectfully submitted,

/s/ Sean S. Kwak

Sean S. Kwak, Esq.

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